

# EXHIBIT 17

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
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6 IN RE: JUUL LABS, INC., MARKETING,  
7 SALES PRACTICES, AND PRODUCTS Case No.  
LIABILITY LITIGATION 19-MD-02913-WHO

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12 VIDEO-RECORDED 30(B)(6) DEPOSITION OF  
13 SAN FRANCISCO UNIFIED SCHOOL DISTRICT  
14 REGARDING COMMUNICATION AND AWARENESS  
15 THROUGH ITS DESIGNEE QUARRY PAK

16 (Via videoconference)

17 Thursday, May 27, 2021  
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24 REPORTED BY:  
25 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR  
JOB NO. 192989

1 of Juul Labs, Inc., defendant.

2 MR. KOUBA: David Kouba on behalf of  
3 the Altria defendants.

4 THE VIDEOGRAPHER: Will the court  
5 reporter please swear in --

6 MS. MILLER: Angela Miller --

7 THE VIDEOGRAPHER: Oh, I'm sorry.

8 MS. MILLER: Angela Miller, San  
9 Francisco Unified School District in-house  
10 counsel.

11  
12 QUARRY PAK,  
13 having first been duly sworn by the  
14 Certified Shorthand Reporter, testified  
15 as follows:

16  
17 THE REPORTER: Thank you. Please  
18 proceed.

19 EXAMINATION

20 BY MR. LEMIEUX:

21 Q. Good morning, Ms. Pak.

22 A. Good morning.

23 Q. Nice to see you again. Thank you for  
24 appearing today.

25 You recall that we had a previous

1 language.

2 Q. Are you familiar with the phrase "harm  
3 reduction model"?

4 A. Yes.

5 Q. What does that mean to you?

6 A. It's meeting people where they are at  
7 and keeping them healthy and safe so they can  
8 make their own decisions on what -- either no  
9 use or limiting use or prevention or not  
10 starting.

11 Q. So in October of 2018, cannabis is  
12 illegal for people under the age of 18 in any  
13 circumstance in California; is that correct?

14 A. Well, for medical -- it's complicated.  
15 For medical reasons, for 18 and over. Anything  
16 for adult use, it's 21.

17 Q. But no one under 18 is allowed to  
18 legally use cannabis in California?

19 A. Correct.

20 Q. So when this presentation that you put  
21 on is talking about harm reduction and meeting  
22 students where they are, does it still recognize  
23 that it's illegal to use marijuana?

24 A. Yes. The goal is to prevent or delay  
25 cannabis use for youth under 21. It states in

1 the presentation.

2 Q. I'm sorry, I didn't hear you clearly.

3 "Delay or"?

4 A. To prevent or delay cannabis use for  
5 youth under 21. That was the goal of the  
6 campaign. I'm reading the documents now.

7 Q. Can you educate me on the delay piece?  
8 Why delay and not just prevent?

9 A. It's delay, prevent, or delay, because  
10 adults over -- 21 and over it's legal. It's  
11 just the law.

12 Q. Do you take a similar approach on  
13 tobacco in terms of a prevent or delay strategy?

14 A. I would say yes, harm reduction does  
15 increase -- does promote those prevent or delay  
16 or limit, depending on where people are at.

17 Q. You're not encouraging people to use  
18 cigarettes, for example?

19 A. No. But we know the research shows  
20 that teenagers, adolescents, until they are 25,  
21 are more susceptible to addiction. So nicotine  
22 is highly addictive. So if they start under  
23 18 -- 90 percent of highly -- use of current  
24 users started before they are 18.

25 So if we can delay, they will less